

EXHIBIT 1

CHRISTOPHER WU
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2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 CASE NO. 7:17-cv-06251-PMH-AEK
-----x

5 HARRIET LOWELL and WESTCHESTER DISABLED
6 ON THE MOVE, INC., individually and on
7 behalf of all others similarly situated,

8 Plaintiffs,

9 - against -

10 LYFT, INC.,

11 Defendant.
12 -----x
13
14
15 VIDEOTAPED DEPOSITION DRAFT of
16 CHRISTOPHER WU, held REMOTELY, before Victoria
17 Russo, a Certified Shorthand Reporter and Notary
18 Public within and for the States of New York and
19 New Jersey, commencing on the above date and time.
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October 26, 2021
10:35 a.m.

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183

1 JMac and Brian Roberts.

2 Q. Why don't we turn to Page ILRC22626.

3 MS. LEE: What page is that in the
4 PDF?

5 MR. FREI-PEARSON: I believe it is
6 Page 10.

7 A. Okay.

8 Q. Do you see where the presentation
9 states "we are currently incentivized to keep WAV
10 programs as small as possible while meeting
11 regulatory requirements. Our big risk is being
12 forced to scale. Regulations are shaped with the
13 correct assumption that we will do as little as
14 possible unless forced."

15 A. I see it.

16 Q. Is it true that the correct assumption
17 is that Lyft will do as little as possible with
18 regard to WAVS unless forced?

19 MS. LEE: Argumentative.

20 A. Is it true that Lyft will do as little
21 as possible unless forced? I mean I think at this
22 time with the appetite the company had this was
23 probably true not related to health care transit
24 university opportunities like in Austin, in Boston,
25 but that was, you know, that was at that time.

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184

1 Q. Are you aware of that ever changing?

2 A. I don't know. I'm not aware, but I
3 haven't been there in so long.

4 Q. Did Lyft ever withdraw from any
5 markets due to WAV requirements?

6 A. There was discussion of it for sure,
7 but I don't remember. I can't remember us
8 withdrawing because of WAV requirements in a market.

9 Q. To the best of your knowledge and
10 memory, Lyft never withdrew from the market due to
11 WAV requirements?

12 A. Yes. Lyft Classic, yeah.

13 Q. What did you mean when you said that
14 "Brooklyn is a case study at risk"?

15 A. I don't recall.

16 Q. Is "Brooklyn" a code for the New York
17 market according to Lyft?

18 A. Yes.

19 Q. And was Lyft forced to provide WAV
20 services in the New York market?

21 A. I don't recall. I don't work on the
22 initial WAV program at -- in New York.

23 Q. To the best of your knowledge, did --
24 was Lyft required to provide WAV services in New
25 York City?